OUTGOING LTR NO DOE ORDER # 94 RF 0 2965 DIST AMARAL, ME BERMAN, H S BRANCH, DB CARNIVAL, G J COPP, R D DAVIS, JG FERRERA, D W HANNI, B J HARMAN, L.K HEALY, T.J. HEDAHL, T HILBIG, J.G HUTCHINS, N M KELL, RE KIRBY, W A KUESTER, A W MAHAFFEEY, J W MANN, HP MARX, GE McDONALD, M M MCKENNA, F G MONTROSE, J K MORGAN, R V POTTER, G L PIZZUTO, V.M. RISING T L SANDLIN, N B SETLOCK, G.H. STEWART DL STIGER, S G SULLIVAN, MT SWANSON, ER WILKINSON, R B WILSON, J M WYANT, RD HOLK PRIMROSE PATS/T 30G (2) RPM Admin Record/080 X orrespondence ontrol CLASSIFICATION UNCLASSIFIED CONFIDENTIAL SECRET AUTHORIZED CLASSIFIER SIGNATURE W VE E LA

EGRG ROCKY FLATS

**EG&G ROCKY FLATS INC** 

ROCKY FLATS PLANT P O BOX 464 GO! DEN COLORADO 80402 0464 (303) 966 7000

March 14 1994

94 RF 02965

Timothy Reeves Environmental Restoration Division DOE/RFO

CORRESPONDENCE OF CONCERN - RZH 008 94

The Environmental Protection Agency's (EPA) request to include Antimony (Sb) and Manganese (Mn) as OU 1 site contaminants is seriously affecting the Corrective MeasuresStudy/Feasibility Study (CMS/FS) project's cost and schedule and I am compelled to bring some of my concerns to your attention

On February 17 1994 after it had become apparent to me that we would experience difficulty in obtaining a resolution to EPA's position. I instructed my subcontractor. Dames & Moore to stop work on the FS Tech Memo 10 (TM #10) Remedial Action Objectives until we could definitely establish the Contaminants List Afixed Contaminants List is needed when establishing Remedial Action Objectives and the Department of Energy/Rocky Flats Office (DOE) EPA and the Colorado Department of Health must come to an agreement on this before we can effectively proceed

However if EG&G Rocky Flats Inc continues to wait until the Final Phase III RFI/RI (RCRA [Resource Conservation and Recovery Act] Feasibility Investigation/Remedial Investigation Report is formally approved the inherent delay in completing TM #10 and starting the 9 Criteria Analysis would prevent us from meeting our milestone of submitting the Draft CMS/FS Report On the other hand I am equally reluctant to push ahead with the FS considering the very real possibility of being required to go back and re do work that the agencies could not approve because it was based on faulty assumptions

As always I would welcome your thoughts on this matter. Any acknowledgement of my perception of this risk would provide an encouraging confirmation and your predictions concerning prudent assumptions (Mn and Sb will be/will not be contaminants) would be greatly appreciated

R Zeke Houk

Operable Unit 2 Project Manager Remediation Project Management

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IN REPLY TO RFP CC NO

ACTION ITEM STATUS

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APPROVALS

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